

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

**WILLIAM DEAN, individually, on
behalf of himself and all others similarly
situated,**

Plaintiff,

v.

**CITY OF MONTICELLO,
MINNESOTA,**

Defendant.

Civ. No. 14-cv-00376 (DFW/JSM)

**PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

Plaintiff William Dean ("Plaintiff") respectfully submits this Motion pursuant to Fed. R. Civ. P. 23(h) and supporting Memorandum for an Order: (1) for an award of attorneys' fees in the amount of \$1.34 million dollars based upon a Lodestar calculation and multiplier. Class Counsel also seek reimbursement of an estimated \$128,414.97 in Litigation Expenses that they reasonably and necessarily incurred in prosecuting and resolving this action ("Action"), including reimbursement of the fees and expenses incurred by the claims administrator for this action, and expenses incurred in connection with the disbursement of settlement funds.

This Motion is based upon all the files, records, and proceedings herein, including the Memorandum of Law in Support of Motion for an Award of Attorneys' Fees and Expenses; the Joint Declaration in Support of Final Approval & Attorney Fee Application, the Declaration of William Dean in Support of Final Approval & Attorney

Fee Application, the Declaration of Steve Platt and exhibits thereto; any further filings in support of the Motion; and the arguments of counsel.

Dated: August 29, 2014

By: s/ Archana Nath

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